

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

| | | |
|--------------------------|---|------------------------|
| UNITED STATES OF AMERICA |) | Criminal No. 21cr10173 |
| |) | |
| v. |) | |
| |) | |
| ANDRE TILAHUN, |) | |
| Defendant |) | |

DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the Defendant Andre Tilahun, by and through his counsel Patrick E. Sheehan, and hereby request this Court enter an order modifying the conditions of release to allow the Defendant a set curfew for the days of the week. The Defendant is currently supervised with home confinement by the Department of Pretrial Services per the release conditions and bail set by this Honorable Court.

Under the current conditions since May 20, 2021, the Defendant has to provide pre-approved “windows” of time when the Defendant is out of the home which routinely include his full-time employment at Amazon, Inc. and when going to the gym for workouts. Per his probation officer Marlenny Ramdehal, the Defendant has had no issues of noncompliance with these terms, including random drug screens. The proposed curfew modification would allow the Defendant to more easily obtain overtime hours which often come at the last minute when he is at his job however, he has no ability to get his “window” of time expanded by the Department of Pretrial Services on such short notice.

The Defendant through counsel states the following:

1. The Defendant’s current schedule and “windows” are:

Mondays: 9:00 a.m. – 12:00 p.m. and 2:00 p.m. to 3:15 p.m.

Tuesdays 2:00 p.m. – 3:15 p.m.

Wednesdays: 5:00 a.m. to 6:30 p.m.

Thursdays: 5:00 a.m. – 6:30 p.m. and 7:00 p.m. to 8:15 p.m.

Fridays: 5:00 a.m. – 6:30 p.m. and 7:00 p.m. to 8:15 p.m.

Saturdays: 5:00 a.m. to 6:30 p.m.

Sundays: 10:30 a.m. – 1:30 p.m. and 2:30 p.m. to 5:30 p.m.

2. The Defendant requests that a curfew be imposed by the Court for the follow days and hours based upon his current work schedule:

Seven days a week: 5:00 a.m. to 7:00 p.m.

3. The Probation Department shall continue to have the discretion to amend these hours for employment and/or educational purposes.

4. The Defendant has made this request in consultation with his probation officer Marlenny Ramdehal who indicates that probation would assent to such a modification.

5. AUSA Benjamin Saltzman has been made aware of this request as well and takes no position on the requested modifications.

WHEREFORE, for the foregoing reasons the Defendant requests this Honorable Court enter an order modifying his conditions of release to allow for a curfew on a daily basis with modifications if deemed appropriate by the Department of Pretrial Services.

Dated this 7th day of February, 2022

/s/ **PATRICK E. SHEEHAN**

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